

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DOCUMENT
ELECTRONICALLY FILED
DOC #: **MAY 24 2007**
DATE FILED: **MAY 24 2007**

UNITED STATES OF AMERICA

- v. -

CHERDELLE BENJAMIN,
a/k/a "Cherdelle Cokley,"
a/k/a "Cherdale Lokley,"

Defendant.

: INDICTMENT
07CRIM. 467

COUNT ONE

The Grand Jury charges:

1. From in or about May, 1999, through in or about February, 2007, in the Southern District of New York and elsewhere, CHERDELLE BENJAMIN, a/k/a "Cherdelle Cokley," a/k/a "Cherdale Lokley," the defendant, unlawfully, willfully and knowingly, did embezzle, steal, purloin, and convert to her own use money and things of value of the United States and a department and agency thereof, to wit, the United States Department of Housing and Urban Development and the United States Social Security Administration, and did receive, conceal, and retain the same with intent to convert it to her own use and gain, knowing it to have been embezzled, stolen, purloined and converted, the value of which exceeded \$1,000, to wit, BENJAMIN received federal housing subsidies and federal disability benefits, to which she was not entitled.

(Title 18, United States Code, Sections 641.)

FORFEITURE ALLEGATION

2. As a result of committing the offense alleged in Count One of the Information, CHERDELLE BENJAMIN, a/k/a "Cherdelle Cokley," a/k/a "Cherdale Lokley," the defendant, shall forfeit to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, any property, real or personal, that constitutes or is derived from proceeds traceable to the federal program fraud offense alleged in Count One, including but not limited to the following:

a. At least \$71,470 in United States currency, in that such sum in aggregate is property representing the amount of proceeds obtained as a result of unauthorized receipt of received federal housing subsidies and federal disability benefits charged in Count One of the Information.

Substitute Asset Provision

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value;

or

e. has been commingled with other property which cannot be subdivided without difficulty;
it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property, including but not limited to the following:

a. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1 Grosvenor Mews, Middletown, New York.

(Title 18, United States Code, Sections 641 and 981 and Title 28, United States Code, Section 2461.)



FOREPERSON



MICHAEL J. GARCIA
United States Attorney

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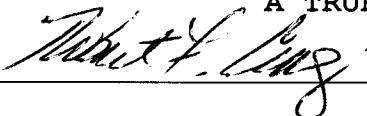
INDICTMENT

07 Cr.

(18 U.S.C. § 641.)

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL



Robert F. Loring

Foreperson.

5/24/07 Indictment filed. Assigned to
Judge Berman.

fox, J.